5.0 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 Rationale for Alternative Selection

CEQA requires the consideration of alternative development scenarios and the analysis of impacts associated with the alternatives. Comparing these alternatives to the proposed project, the advantages of each alternative can be analyzed and evaluated; refer to Table 5-1. Section 15126.6 of the CEQA Guidelines requires that an EIR:

> *…describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

Additionally, CEQA Guidelines Section 15126.6 states in part:

> *An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible (15126.6(a)).*

The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination.

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts (15126.6(c)).

The specific alternative of "no project" shall also be evaluated along with its impact (15126.6(e)(1)). If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6(e)(2)).

5.1.1 Alternatives Considered but Rejected from Further Detailed Analysis

Golf Course Alternative

The Golf Course Alternative would develop a 9-hole or 18-hole golf course on the property and construction of an approximately 5,000-square foot-clubhouse with restaurant and bar, proshop, and restrooms. This use was previously considered for the property prior to its recent sale and is therefore considered to be a valid alternative for discussion. This alternative would complement future development of the nearby Jamul Indian Village Casino Development project, if constructed, and would provide additional recreational opportunities in the community. The existing residential use on the property would remain with this alternative.

Impacts on groundwater would be reduced with this alternative than with those of the proposed project, as the property would be annexed into the San Diego County Water Authority (SDCWA) and the Metropolitan Water District (MWD) for water service purposes. Impacts resulting from hazards would also be reduced, as this alternative would not propose residential development that would expose residents to the risk of wildfire. In addition, this alternative would have no potential hazards from the equestrian uses.

However, development of this alternative is inconsistent with the terms of the purchase agreement between the applicant and the former owner, as the agreement does not allow golf course use.

This alternative would not support the public amenities (fire station) provided by the project, or provide for private or public equestrian uses. This alternative fails to meet most of the project objectives and is therefore, not considered for additional analysis.

Commercial Use Alternative

The Commercial Use Alternative proposes to develop a portion of the property with commercial use to complement the proposed Jamul Indian Village Casino Development project. The casino is proposed on lands to the west of PVR across SR-94 and south of Melody Road. The preferred alternative for the casino includes development of a 205,194-square foot (SF) casino and a 24,000-SF event center with associated parking, a hotel, recreational vehicle parking, a health center, and other supporting development. The Commercial Use Alternative would require a General Plan amendment (GPA) and rezone to allow commercial development on a portion of the western 28.85 acres of the property. Proposed development would likely consist of a mixture of several small-scale retail stores, restaurant, and parking and public open areas.

This alternative proposes that the eastern 152.46 acres of the property remain under the (18) Multiple Rural Use land use designation with the A72(8) zone, and development would allow 19 residential units. In addition, there would be no public/private equestrian uses with this alternative; however, the alternative would include construction of a fire station on the property.

This alternative would have greater traffic impacts as compared to the proposed project as a result of its small-scale commercial uses. With this alternative, impacts on biological resources would be the same as for the proposed project. Similar to the proposed project, open space would be preserved along the major drainage and in the northwestern portion of the property for the protection of sensitive resources and offsite mitigation land would be acquired and dedicated.

Under this alternative, the noise impact would likely be reduced as compared to the proposed project. The Commercial Use Alternative would locate commercial uses in the western portion of the site, near SR-94. Residential uses would be distanced from the roadway, thereby having less potential noise impact on onsite residents as compared to the proposed project. This alternative would also place residential uses at a greater distance from the fire station, thereby reducing potential noise impacts resulting from operation of the facility.

With this alternative, the existing onsite open space easement would remain in place for the protection of significant cultural resources. As this alternative would require discretionary permit review and approval subject to CEQA, mitigation would occur, and the site would be

capped as with the proposed project. Therefore, long-term protection of cultural resources on the site would be the same for the Commercial Use Alternative as for the proposed project. Impacts on cultural resources would be similar with this alternative as compared to the proposed project.

The Commercial Use Alternative would reduce potential impacts resulting from hazards, as the equestrian facilities would not be developed, and would thereby have fewer potential hazards from animal waste management and vector control. In addition, potential impacts on groundwater would also be reduced, as groundwater would not be required for irrigation of the polo field. However, land use of this alternative would not be consistent with several of the project objectives. This alternative would not achieve a residential yield consistent with the rural community character of the surrounding area. In addition, the alternative would not provide the desired equestrian uses for public or private use. For these reasons, this alternative was not considered for additional analysis.

5.2 Analysis of the No Development Alternative (Alternative 1)

5.2.1 No Development Alternative Description and Setting

The No Development Alternative assumes that the project site would not be developed with the proposed project. The 53 residential units allowed under the existing (18) Multiple Rural Use and (17) Estate Residential General Plan designations would not be constructed. The project site would remain in its present condition and would continue to support the existing residential and agricultural uses. In addition, the site proposed for location of the joint RFPD and USFWS fire station would not be dedicated. The fire station would instead be located on a leased parcel and the RFPD would be financially responsible for construction of Peaceful Valley Road to Melody Road to provide access to the site. Without the proposed project, annexation into the SDCWA and MWD would not occur; however, the proposed fire station lot would be within the 28.85-acre portion of the site that is within the SDCWA, OWD, MWD, the OWD Improvement District Number 9, and District water service would therefore be available. The RFPD would be financially responsible for extending the water line to the subject lot for service.

The No Development Alternative would reduce or avoid most of the impacts associated with the proposed project. Therefore, after the proposed project, the No Development Alternative is considered to be the Environmentally Superior Alternative. However, the No Development Alternative could result in greater impacts on hydrology and water quality as no Best Management Practices would be required nor drainage improvements constructed, thereby allowing surface water runoff to continue to leave the site untreated. Additionally, current groundwater use under the No Development Alternative would remain un-restricted and would not be recharged through the use of imported water thus leading to potential greater impacts to groundwater than that under the Proposed Project.

5.2.2 Comparison of the Effects of the No Development Alternative to the Proposed Project

Traffic and Circulation

As compared to the proposed project, this alternative would not result in the construction of new residential units; however, the fire station would be built as part of the project. As calculated in the traffic analysis (Appendix B), the fire protection service facilities would generate 133 average daily trips (ADT). Therefore, this alternative would reduce ADT by 617 trips as compared to the proposed project.[1] Therefore, impacts to traffic and circulation resources under the No Development Alternative would be reduced as compared to the project.

However, as stated above, the fire station would relocate to the subject property on a leased parcel, and the RFPD would be required to provide access to the facilities. Peaceful Valley Road onsite would be improved from the Melody Road/SR-94 intersection to the fire station site by the RFPD. The driveway would be graded to 32 feet and surfaced with asphaltic concrete to 24 feet in width. Widening would occur along SR-94 to improve site distance, as with the proposed project. As the District would be responsible for these improvements if the proposed project is not constructed, such requirements may represent a financial burden to the District.

Biological Resources

This alternative would not impact biological resources because no development would occur. However, this alternative would not preserve onsite habitat through dedication of a Biological Open Space Easement. In addition, no offsite mitigation land within the County's MSCP would be purchased. Therefore, impacts to biological resources under the No Development Alternative would be reduced as compared to the project.

Hazards

As with the proposed project, impacts from hazards would be less than significant. However, the No Development Alternative would not have the equestrian facilities associated with the proposed project, and thereby would have less human exposure to vectors and animal waste. In addition, this alternative would have far fewer residents potentially exposed to the risk of wildfire. Therefore, the potential for exposure of residents to hazards or hazardous materials under the No Development Alternative would be reduced as compared to the project.

Noise

Similar to the proposed project, impacts from noise would be less than significant under this alternative. The No Development Alternative would not result in significant noise impacts, such as temporary construction noise, and future lots adjacent to SR-94 would not be

[1] It should be noted that the traffic analysis for the proposed project, as described in Section 2.1, considers the combined impacts of 47 residential units: one existing dwelling unit and 46 new units, which would generate an estimated 564 average daily trips (ADT) from the residential uses. This allows for a more conservative analysis of potential project traffic impacts. An additional 50 ADT would be generated by the equestrian facilities, and the fire station would generate an estimated 133 ADT, for a project total of 750 ADT.

exposed to offsite traffic noise. Noise impacts resulting from this alternative would therefore be reduced as compared to the proposed project.

Cultural Resources

Similar to the proposed project, impacts on cultural resources would be less than significant under this alternative. The existing onsite open space easement would remain in place for the protection of significant cultural resources. However, the site would not be capped for the long-term protection of cultural resources. Therefore, the potential impacts would be reduced as compared to the proposed project, but the long-term protection of cultural resources on the site would be reduced with the No Development Alternative.

Land Use

As with the proposed project, land use impacts would be less than significant under this alternative. However, as no development would occur and the site would likely remain in its present use, no revisions to the existing land use and zoning designations would be required. Therefore, impacts to land use and zoning designations under the No Development Alternative would be reduced as compared to the project.

Agricultural

As with the proposed project, this alternative would not result in a significant impact on agricultural resources. However, as no development would occur and the site would continue to support the active agricultural and single-family uses, the land would remain in agricultural production, and potential impacts on agricultural resources would be reduced with this alternative.

Groundwater Resources

No significant unmitigated impacts on groundwater resources were identified with the proposed project. However, with this alternative, the subject property would not be annexed into the water district for service and the existing uses would therefore remain dependent upon groundwater for continued irrigation of the agricultural crops, as well as for residential use. However, annual groundwater use for the existing residence and agricultural operation is estimated to be approximately 11 acre-feet per year, as compared to 22.2 acre-feet per year with the proposed project. The amount of groundwater extraction for the proposed project would be similar to the amount of groundwater recharge the project contributes from imported water (as a result of irrigation and septic systems associated with the proposed residential units). The fire station would be located on a leased lot under this alternative. The RFPD would be served by the Otay Water District, with the extension of the water line into the site with construction of the station. Although the existing residence and agricultural uses would utilize a lesser amount of groundwater than the proposed project, these uses would not utilize imported water and thus would not generate any groundwater recharge from imported water. Therefore, net impacts on groundwater resources with this alternative are anticipated to be greater as compared to the proposed project.

Hydrology and Water Quality

As with the proposed project, this alternative would not result in a significant impact on existing hydrology and water quality. The site would remain in its present state and no alteration of the site or other surface features would occur. However, no Best Management Practices (BMPs) would be required and no drainage improvements would occur. Surface water runoff would continue to leave the site untreated as it presently does, potentially resulting in impacts on hydrology and water quality. Those impacts are considered to be greater with this alternative as compared to the proposed project.

Air Quality

As with the proposed project, as discussed in Section 4.1.4, impacts on air quality associated with this alternative would be less than significant. Because the No Development Alternative would have no development on the site, there would be no vehicle trips and associated air quality effects. This alternative would also have no air quality effects associated with construction vehicles and equipment. Therefore, impacts to air quality under the No Development Alternative would be reduced as compared to the project.

Utilities and Service Systems

As with the proposed project, this alternative would not result in significant impacts on utilities or public services. However, under the No Development Alternative, a lesser demand would be placed on existing or future utility systems and public services, as no residential development would occur on the site. Therefore, this alternative would reduce impacts on utilities and service systems as compared to the proposed project.

5.2.3 Rationale for Preference of Proposed Project over the No Development Alternative

Although most impacts of this alternative would be less than those of the proposed project, and this alternative is the Environmentally Superior Alternative, it fails to meet any of the project objectives outlined in Section 1.0. The No Development Alternative does not allow for a development that would provide an equestrian-oriented project that would offer the private or public equestrian uses proposed with the project, nor financially support the public amenities proposed with the project (i.e. fire station site). As the site would remain in its present state and design aspects such as sheltering-in-place construction and landscaping features would not occur, this alternative would also not achieve the objective of reducing the risk of wildfire in the area, nor provide resources to increase public safety and facilitate the efficient provision of fire protection services for the community of Jamul and the surrounding area. In addition, the RFPD would be responsible for the cost of roadway improvements to Peaceful Valley Ranch Road to provide access to the facilities. This could likely inhibit the ability of the RFPD to develop on the subject site, potentially requiring them to select another site elsewhere, thereby further reducing the potential to provide efficient provision of fire services in the area. For these reasons, the No Development Alternative is rejected.

5.3 Analysis of the No Project Alternative (Alternative 2)

5.3.1 No Project Alternative Description and Setting

The analysis of the No Project alternative is required under CEQA Guidelines. As set forth in CEQA Guidelines Section 15126.6(e)(2), the No Project analysis shall discuss the existing conditions at the time the notice of preparation is published and "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Section 15126.6(e)((3)(B) adds that, for a development project on identifiable property, the No Project alternative is the circumstance under which the project does not proceed, and "the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved."

The No Project Alternative would develop the project site as allowed under the current land use and zoning designations without special permitting. The No Project Alternative would result in residential development of the five legal lots established by the underlying parcel map, and would allow continuation of agricultural uses by lot owners, if they elect to do so. The eastern portion of the project site would not be annexed into the MWD and SDCWA and would remain dependent on groundwater, as annexation to the District would be financially unjustifiable for the small number of residential lots proposed. Therefore, lots would depend on groundwater resources for both residential and agricultural uses. This alternative would also leave Jamul Creek Road (SC 760) alignment in its currently adopted location. In addition, the site proposed for location of the joint RFPD and USFWS fire station would not be dedicated; the fire station would instead be located on a leased parcel and the RFPD would be financially responsible for construction of Peaceful Valley Road to Melody Road to provide access to the site. This could likely inhibit the District's ability to relocate on the subject property, thereby affecting the ability of the project to contribute to increased public safety and fire protection service capabilities for the Jamul community and the surrounding area. Water service for the fire station would be provided by the District, with the RFPD responsible for extension of the water line to the fire station lot.

5.3.2 Comparison of the Effects of the No Project Alternative to the Proposed Project

Traffic and Circulation

The No Project Alternative would have fewer traffic and circulation impacts as compared to the proposed project. The number of residential lots proposed would be five instead of 47 (including the existing home), thereby reducing traffic generated by the project from 750 to 193 ADT (includes 133 ADT generated by the fire station), using the County standard of 12 ADT per household. Impacts on the SR-94/Melody Road intersection would also be reduced with this alternative. Circulation impacts would be reduced as compared to the proposed project because access to the project site would continue to be provided from the existing Peaceful Valley Road alignment from SR-94.

Biological Resources

With the No Project Alternative, impacts on biological resources would be the same as for the proposed project. Although the number of proposed structures on the site would be less,

the size of the lots would be larger, such that the overall use of the property would be the same. Residential and agricultural uses allowed by right on the project site would not be required to provide the same measures to protect sensitive resources as the proposed project. As a result, the biological impacts may be similar to those of the proposed project, but there would be no assurance of mitigation.

Hazards

As stated in Section 4.1.5, no significant impacts resulting from hazards would occur with the proposed project. However, impacts resulting from hazards or hazardous materials would be reduced with this alternative, as the number of residential units onsite would be fewer, thereby resulting in fewer residents potentially at risk from wildfire. Residential development would be required to comply with applicable County and RFPD ordinances and policies intended to reduce the risk of wildfire through structural and fuel management requirements. Therefore, impacts from hazards or hazardous materials under the No Project Alternative would be reduced as compared to the project.

In addition, with the No Project Alternative, neither the private nor public equestrian uses would be developed on the site, thereby resulting in fewer hazardous impacts from the presence of animal waste and vectors as compared to the proposed project. Although individual homeowners may keep horses on their property, horsekeeping will occur at a reduced scale as compared to the proposed project and would therefore generate less animal waste to be managed onsite. The presence of watering troughs, washing areas, and other areas where water would be present for equestrian uses would also be reduced with this alternative than with the proposed project.

Noise

With this alternative, the noise impact would be reduced, as fewer people would potentially be exposed to significant noise levels. By proposing fewer lots on the 181.31-acre property, the lot sizes would be larger, thereby allowing homesites to be located at a greater distance from potential traffic noise generated along SR-94. A site plan would still be required for the fire station and traffic noise impacts on the fire station would sill be assessed at the time of the site plan application. Therefore, impacts from noise under the No Project Alternative would be reduced as compared to the project.

Cultural Resources

With this alternative, the existing onsite open space easement would remain in place for the protection of significant cultural resources. An application for a site plan would still be required for the fire station, which would be located on the same lot as the existing archaeological easement. The site plan is a discretionary permit and would be subject to CEQA. As such, mitigation for cultural resources would be subject to CEQA and would be the responsibility of the RFPD. Therefore, potential impacts to cultural resources would be similar to the proposed project.

Land Use

Although there are no significant land use impacts with the proposed project, land use impacts of this alternative would be reduced compared to those of the proposed project, as no

GPA or rezone would be required. The No Project Alternative would be consistent with applicable land use plans and zoning, as development of the site would occur under the current land use and zoning designations. Development of a fire station could be permitted with the approval of a site plan. No significant land use or planning impacts would result with the No Project Alternative. Therefore, impacts to land use and zoning designations under the No Project Alternative would be reduced as compared to the project.

Agricultural

This alternative would not result in significant impacts on agricultural resources. This alternative would develop five single-family lots on the property, and agricultural uses would be permitted to continue on individual lots. As such, potential impacts on agricultural resources under this alternative would be less than the proposed project, as the land would not be removed from the County's agricultural land resources.

Groundwater Resources

No significant impacts on groundwater resources were identified with the proposed project. However, with this alternative, the easterly portion of the subject property would not be annexed into the SDCWA and MWD for water service, as annexation would not be financially justified. Therefore, the resulting residential uses, and any associated agricultural uses, would remain dependent upon groundwater. Water service for the fire station would be provided by the District, with the RFPD responsible for extension of the water line to the fire station lot. With five single-family homes, each utilizing 0.5 acre-feet of groundwater per year, plus unrestricted groundwater use for limited agricultural uses, the development under the No Project Alternative could potentially use more groundwater than the 22.2 acre-feet/year proposed for use with the project. However, historically, onsite agricultural uses, in combination with the existing residence annually utilized an estimated 11 acre-feet per year of groundwater. Therefore, with the addition of four single-family residences under this alternative, annual groundwater use is anticipated to be less than 22 acre-feet per year.

The amount of groundwater extraction for the proposed project would equal the amount of groundwater recharge the proposed project contributes from imported water as a result of recharge from irrigation and septic systems associated with the proposed project residential units. Although the number of residential units would be reduced under this alternative and the polo field would not be developed, the residential and agricultural uses under this alternative would not utilize imported water and thus would not generate any groundwater recharge from imported water. Therefore, net impacts on groundwater resources with this alternative are anticipated to be greater as compared to the proposed project.

Hydrology and Water Quality

As discussed in Section 4.1.3, the proposed project would not result in a significant impact on hydrology and water quality. The construction of homes and a fire station under this alternative would be required to implement construction BMPs that would reduce potential impacts to stormwater from erosion or release of contaminants into the stormwater system. In addition, the amount of impervious surface on the site would be reduced with the No Project Alternative as compared to the project because it would have fewer residential units. Impacts

on hydrology and water with this alternative would be similar to those of the proposed project.

Air Quality

As discussed in Section 4.1.4, the proposed project would not result in significant impacts on air quality. However, the No Project Alternative would generate fewer vehicle trips, thereby resulting in incrementally reduced air quality impact. In addition, by having fewer the number of homes on the site, there would be less grading with heavy equipment. Therefore, air quality impacts associated with construction would be incrementally reduced to those of the proposed project.

Utilities and Service Systems

As discussed in Section 4.1.5, the proposed project would not result in significant impacts on utilities or service systems. However, the No Project Development Alternative would have reduced demand on utility and public service systems as compared to the proposed project because fewer residential units would require such services. Therefore, potential impacts on utilities and service systems would be reduced with this alternative than with the proposed project.

5.3.3 Rationale for Preference of the Proposed Project over the No Project Alternative

This alternative would have fewer impacts on traffic and noise as compared to the project. In addition, this alternative would have incrementally reduced impact to air quality as compared to the project, as fewer vehicle trips would be generated by a lesser number of residential units. However, impacts on groundwater could increase with this alternative, as public water service would not be provided to the five residential units and there would be no limitation on the continued use of groundwater for agricultural activities, thereby potentially conflicting with regional and County goals pertaining to groundwater use. Additionally, the property would not achieve the objective of providing the public or private equestrian uses for the Jamul community, nor would it meet the objective of providing the public amenities included with the project, as land would not be conveyed to the RFPD for relocation of the fire station. Although the alternative would be required to provide preventative design measures to reduce the potential for the spread of wildfire, this alternative would require that the RFPD pay for improvements to Peaceful Valley Ranch Road for access that may cause the District financial hardship and inhibit its ability to locate at the site. If the fire service facilities were not relocated to the subject property, this alternative would not achieve the objective of providing resources to increase public safety and facilitate the efficient provision of fire protection services for the community of Jamul and the surrounding areas. For these reasons, the No Project Alternative is rejected.

5.4 Existing Land Use Regulations Alternative (Alternative 3)

5.4.1 Existing Regulations Alternative Description and Setting

The Existing Land Use Regulations Alternative proposes a design that has no public or private equestrian facilities and subdivides the property for residential development, consistent with the existing zoning regulations that apply to the property. This alternative

would result in 33 dwelling units (theoretical yield), as allowed under the existing A-72 (2) and A-72 (8) zoning regulations. On the 28.85-acre portion of the property, existing zoning would allow 2-acre lots, resulting in approximately 14 dwelling units. On the 152.46-acre portion, the A72 (8) zone would allow for 8-acre lots, resulting in approximately 19 dwelling units. This alternative would not include construction of the equestrian facilities; however, a parcel would still be reserved for construction of the fire station. The eastern portion of the property would be annexed into to the SDCWA and MWD for water service and would therefore not depend on groundwater. This alternative would also leave the SC 760 alignment in its adopted location.

5.4.2 Comparison of the Effects of the Existing Land Use Regulations Alternative to the Proposed Project

Traffic and Circulation

At a trip generation rate of 12 ADT per unit, this alternative would generate 529 ADT (33 dwelling units plus 133 ADT for the fire station), as compared to 750 ADT with the proposed project, which includes ADT generated by the equestrian facilities and fire station. Similar to the proposed project, this alternative would result in significant impacts on SR-94. Mitigation would be required in the form of contribution to the County's Transportation Impact Fee (TIF) Program, although similar to the proposed project, impacts would remain significant and not mitigated. However, as overall ADT would be reduced with this alternative, traffic impacts would be reduced as compared to the project.

Biological Resources

Under this alternative, impacts on biological resources would be similar as compared to the proposed project. Although this alternative would result in 13 fewer new residential units, the overall development area would be the same as the proposed project, and therefore, impacts on biological resources would be similar. Similar to the proposed project, measures for the protection of onsite biological resources would be required. However, as this alternative would not include the use of groundwater, potential impacts to sensitive vegetation as the result of groundwater drawdown would be reduced as compared to the project, and mitigation for such impacts would not be required. Therefore, impacts to biological resources with this alternative would be reduced as compared to the project.

Hazards

Although no significant impacts related to hazards or hazardous materials would occur with the proposed project, the number of residential units onsite would be less with this alternative, thereby potentially exposing fewer residents to hazards related to wildfire. Similar to the proposed project, the Existing Land Use Regulations Alternative would be required to conform to County and RFPD policies and measures intended to reduce the potential for risk of wildfire. Similar to the project, hazards resulting from the risk of wildfire would be mitigated through conformance with design elements included in a Wildfire Safety/Vegetation Management Master Plan, which would be required for the project.

In addition, potential hazards resulting from the management or presence of animal waste and potential vectors onsite would be fewer as compared to the project. Neither the public

nor private equestrian uses would be developed onsite with this alternative. Equestrian uses may be present on individual lots, but at a smaller scale and without the equestrian facilities associated with the proposed project. As no Major Use Permit would be required for the equestrian uses, equestrian uses on individual lots would not be regulated; however, as with the proposed project, individual equestrian uses would be regulated by County nuisance guidelines and standards for such issues as noise and odors, similar to existing equestrian activities on surrounding private properties. In the practice of good animal husbandry, and in conformance with Title 6, Division 2, Chapter 1 (Section 62) of the San Diego County Code of Regulatory Ordinances, appropriate management of the equestrian uses on individual lots would reduce the potential for pests to breed onsite. Enforcement of public health and safety codes, as applicable to the proposed public equestrian activities, would be the responsibility of the County. However, potential hazards resulting from the management or presence of animal waste and potential vectors onsite are not anticipated to increase with this alternative as compared to the project without a regulatory use permit. Significant impacts resulting from hazards and hazardous waste from the Existing Land Use Regulations Alternative would be reduced as compared to the proposed project.

Noise

With this alternative, noise impacts would be greater as compared to the proposed project. Although fewer dwelling units would be constructed under this alternative, the A72(2) zone would allow 14 lots within the westerly 28.85 acres of the property (as compared to the five proposed with the project), potentially exposing a greater number of residences to noise generated by vehicles traveling on SR-94. As discussed in Section 4.1.1.3, public input received on the proposed project has indicated that the community would prefer a development scenario of the property that allowed for a reduced density of lots along SR-94 to more evenly distribute residential units across the property, thereby strengthening the project's consistency with the rural community character of Jamul. As this alternative would result in a greater density of lots within the 28.85-acre portion of the property, this alternative would result in a density that is inconsistent with the direction of the community planning group.

In addition, location of the fire station within the portion of the property where two-acre lots would occur with this alternative would also result in the exposure of an increased number of residents to noise. As the density would be greater in this area, a greater number of residential units would potentially be located closer to the fire station, or along Peaceful Valley Ranch Road, which would provide access to and from the service facilities.

Although mitigation measures for this alternative would be the same as for the proposed project to reduce potential noise impacts to residential uses along SR-94, noise impacts would be greater as compared to the proposed project, as a greater number of homes would potentially be exposed to roadway noise from SR-94. Furthermore, this alternative would require an approximately 8-foot sound attenuation barrier approximately 200 feet from the centerline of SR-94. This would be a continuous noise wall along western edge of the proposed houses. Therefore, significant noise impacts would be greater with the Existing Land Use Regulations Alternative as compared to the proposed project.

Cultural Resources.

With this alternative, the existing onsite open space easement would remain in place for the protection of significant cultural resources. As discretionary permit review and approval would be subject to CEQA, cultural mitigation would occur with this alternative, and the site would be capped as it would with the proposed project. Therefore, long-term protection of cultural resources on the site would be the same for the Existing Land Use Regulations Alternative as for the proposed project. Impacts on cultural resources would therefore be similar with this alternative as compared to the proposed project.

Land Use

The Existing Land Use Regulations Alternative would be consistent with the existing applicable land use and zoning designations. Although there are no significant land use impacts with the proposed project, land use impacts with this alternative would be reduced as compared to the proposed project, as no GPA or rezone would be required, as would the proposed project. As stated, this alternative would result in 33 dwelling units (theoretical yield), as allowed under the existing A-72 (2) and A-72 (8) zoning regulations. On the 28.85-acre portion of the property, existing zoning would allow 2-acre lots, resulting in approximately 14 dwelling units. On the 152.46-acre portion, the A72 (8) zone would allow for 8-acre lots, resulting in approximately 19 dwelling units. Within the A72 zone, the single-family residential use proposed with this alternative is allowed by right, as would be agricultural uses (i.e. equestrian, small-scale agriculture). Therefore, this alternative would not conflict with the County Zoning Ordinance. As such, similar to the proposed project, no mitigation would be required for this alternative. As stated above, this alternative would reduce potential impacts to land use compatibility under the Existing Land Use Regulations Alternative would be reduced as compared to the project, as no rezone or GPA would be required for implementation.

Agricultural

As with the proposed project, the Existing Land Use Regulations Alternative would result in the partial conversion of the property from agricultural use to residential use; however, similar to the proposed project, impacts on agricultural resources would be less than significant, as development of the site would not impede future agricultural uses in the Jamul/Dulzura community or result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The property would support residential uses, and owners would be allowed to continue agricultural activities (e.g., livestock, orchards, etc.) on individually owned, two- to eight-acre lots, consistent with the A72 agricultural zone. However, the Existing Land Use Alternative would not include an agricultural business such as the polo pony breeding operation proposed as part of the proposed project. Impacts on agricultural resources with this alternative are therefore considered to be similar to that of the proposed project.

Groundwater Resources

With this alternative, the eastern portion of the property would be annexed to the SDCWA and MWD for water service and the property would therefore not depend on groundwater. In addition, this alternative would not result in development of the equestrian facilities,

including the polo field, as would the proposed project. Therefore, potential impacts resulting from groundwater use would be reduced under this alternative because groundwater would not be utilized for irrigation of any portion of the property. Although the PVR property would retain its existing rights to groundwater with this alternative, none of the 33 proposed units would depend on groundwater sources. In addition, as this alternative would not include the use of groundwater, potential impacts to sensitive vegetation as the result of groundwater drawdown would be reduced as compared to the project, and mitigation for such impacts would not be required. Impacts on groundwater resources with this alternative would be reduced as compared to the proposed project.

Hydrology and Water Quality

As with the proposed project, impacts on hydrology and water quality would be less than significant with this alternative. However, the area of impervious surfaces would be smaller with this alternative, including buildings, driveways and roadway surfaces, thereby resulting in incrementally reduced hydrology and water quality impacts compared to the proposed project. Although no mitigation would be required, BMPs similar to those of the proposed project would be implemented to reduce potential water quality impacts. Therefore, impacts to hydrology and water quality with this alternative would be similar to the proposed project.

Air Quality

As discussed in Section 4.1.4, the proposed project would not result in significant impacts on air quality. However, the Existing Land Use Regulations Alternative would generate fewer vehicle trips as compared to the proposed project, resulting in incrementally fewer air quality impacts. In addition, by developing fewer homes on the site, emissions associated with heavy equipment used for grading would also be reduced. No mitigation for air quality impacts would be required with this alternative. Impacts would be less than significant. Therefore, although the proposed project would not result in significant impacts on air quality, impacts to air quality would be incrementally reduced with this alternative as compared to the proposed project.

Utilities and Public Services

As with the proposed project, no significant impacts on utilities and public services would result with this alternative, and no mitigation would be required. However, as fewer residential units would be constructed, demand for utilities and public services would be incrementally reduced as compared to the proposed project.

5.4.3 Rationale for Preference of the Proposed Project over the Existing Land Use Regulations Alternative

The Existing Land Use Regulations Alternative would reduce traffic and circulation impacts as compared to the proposed project, as 13 fewer residential units would be constructed. Impacts on groundwater resources would also be reduced as compared to the proposed project, as neither the private nor public equestrian facilities would be constructed, and would therefore not require irrigation utilizing groundwater. Impacts to land use and air quality would also be reduced with this alternative as compared to the proposed project. However, this alternative fails to meet the objective of developing an equestrian-oriented

project that incorporates both public and private equestrian facilities for the Jamul community, or of proactively providing increased resources for the community to fight wildfires (i.e staging area). In addition, this alternative would not achieve the goal of providing a project design that is consistent with the rural community of Jamul, as the design would result in increased density of dwelling units in the portion of the property closest to SR-94, contrary to the type of design the community has indicated they would desire. For these reasons, the Existing Land Use Regulations Alternative is rejected.

5.5 Analysis of the Residential Use Alternative (Alternative 4)

5.5.1 Residential Use Alternative Description and Setting

The Residential Use Alternative proposes application of the (17) Estate Residential land use designation over the entire property. This alternative would allow up to 90 two-acre minimum residential lots. No additional development, such as the public/private equestrian facilities is proposed with this alternative; however, reservation of a lot for relocation of the RFPD fire station would occur. The eastern portion of the property would be annexed into the SDCWA and MWD and proposed uses would therefore not depend upon groundwater use, similar to the proposed project. This alternative would also eliminate the SC 760 alignment from the County's Circulation Element, similar to the proposed project.

5.5.2 Comparison of the Effects of the Residential Use Alternative to the Proposed Project

Traffic and Circulation

The Residential Use Alternative would have greater traffic impacts and incremental impacts on air quality as compared to the proposed project, as it would allow 44 more new residential units than the proposed project. Using a trip generation rate of 12 ADT per unit, this alternative would generate 463 more trips than the proposed project.

Similar to the proposed project, the impacts on SR-94 between Jamacha Road and Melody Road would not be fully mitigated, and a fair share contribution to signalization and intersection improvements would be required. An increase in the fair share contribution would be required under this alternative, due to the greater number of units constructed and the resulting in higher traffic generation. Therefore, impacts to traffic and circulation would be greater than the proposed project.

Biological Resources

Under this alternative, impacts on biological resources will be the same as for the proposed project, as the development area would be the same. Onsite open space proposed with the project along the major drainage and in the northwestern portion of the property would remain with this alternative. Impacts to groundwater dependent vegetation would be reduced because the project would not utilize groundwater. Mitigation measures for this alternative would be similar as for the proposed project.

Hazards

Although no significant impacts from hazards or hazardous materials would occur with the proposed project, with this alternative such impacts would be greater, as a greater number of residences would be constructed on the property, thereby exposing a greater number of people to potential risk from wildfire. In addition, as the equestrian polo field would not be developed with this alternative, the Safety Zone and Staging Area and emergency helipad proposed with the project would not be available for use in times of emergency, thereby resulting in greater human safety risk and the need for emergency access. Therefore, impacts from hazards and hazardous wastes would be greater than the proposed project.

In addition, with the Residential Use Alternative, neither the private nor public equestrian uses would be developed on the site. Although individual homeowners could keep horses on their property, the scale of horsekeeping would be smaller, thereby generating less animal waste to be managed onsite. Facilities associated with the equestrian uses where water would potentially be present (e.g., watering troughs, bathing areas) will also be reduced on the property.

Noise

Noise impacts will be significant under this alternative, as they would be with the proposed project. Development of 90 two-acre minimum lots would require that a greater number of residences be located in the area closer to SR-94, thereby potentially exposing a greater number of residents to noise levels that may exceed County noise level standards. Mitigation measures for this alternative would be the same as for the proposed project in that a noise analysis will be required to demonstrate that the project complies with the County's interior and exterior noise standards. This alternative would require an approximately 8-foot sound attenuation barrier approximately 200 feet from the centerline of SR-94. This would be a continuous noise wall along western edge of the proposed houses. Therefore, impacts from noise would be greater as compared to the proposed project.

As the fire station would not be constructed on the site with this alternative, no mitigation requiring noise analysis of the fire station will be required.

Cultural Resources

With this alternative, the existing onsite open space easement would remain in place for the protection of significant cultural resources. Similar to the proposed project, the site would be capped; therefore, impacts on cultural resources on the site would be similar to those of the proposed project with the Residential Use Alternative.

Land Use

The Residential Use Alternative proposes no public and private equestrian facilities and application of the (17) Estate Residential land use designation over the entire property. This alternative would allow up to 90 two-acre minimum residential units. Because this alternative exceeds what is permitted under the existing land use and zoning designations, this alternative would require an amendment to the *General Plan* to revise the existing (18) Multiple Rural Use to (17) Estate Residential, similar to the proposed project. As with the

proposed project, impacts on land use would be less than significant. Therefore, impacts to land use would be similar to the proposed project.

Agricultural

As with the proposed project, the Residential Use Alternative would result in the partial conversion of the property from agricultural use to residential use; however, similar to the proposed project, impacts on agricultural resources would be less than significant, as development of the site would not impede future agricultural uses in the Jamul/Dulzura community or result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Although the property would support residential uses, owners would be allowed to continue agricultural activities on individually owned lots, consistent with the A72 agricultural zone. However, the Residential Use Alternative would not include an agricultural business such as the polo pony breeding operation proposed as part of the proposed project. Impacts on agricultural resources with this alternative are therefore considered to be similar to that of the proposed project.

Groundwater Resources

With this alternative, the eastern portion of the property would be annexed into to the SDCWA and MWD for water service and the property would therefore not depend on groundwater. Groundwater would not be required for irrigation purposes, as the equestrian facilities would not be constructed under this scenario. Impacts on groundwater resources with this alternative are therefore anticipated to be reduced to that of the proposed project. Impacts to groundwater dependent vegetation are reduced as well because the project would not utilize groundwater.

Hydrology and Water Quality

As with the proposed project, impacts on hydrology and water quality would be less than significant. However, as this alternative would result in 43 more development lots than the proposed project, the resulting area of impervious surfaces (i.e. driveways) on the subject site would be greater, thereby resulting in incrementally greater hydrology and water quality impacts beyond those that would occur with the proposed project. Required stormwater facilities would be adjusted accordingly and BMPs would be required to reduce potential water quality impacts to less than significant. However, due to the increase in impervious surfaces, impacts to hydrology and water quality are considered to be greater than those resulting from the proposed project.

Air Quality

As with the proposed project, as discussed in Section 4.1.4, impacts on air quality associated with this alternative would be less than significant. However, since the Residential Use Alternative would have greater development on the site, vehicle trips and associated air quality effects related to the proposed project would be greater. This alternative would also have greater air quality impacts associated with vehicles and equipment required for grading and construction of the residential units. Therefore, impacts to air quality would be greater than the proposed project.

Utilities and Services

As with the proposed project, this alternative would not result in significant impacts on utilities or public services and no mitigation would be required. However, the Residential Use Alternative would have greater development on the site. Therefore, the Residential Use Alternative would result in greater impacts on utilities and service systems than the proposed project.

5.5.3 Rationale for Preference of the Proposed Project over the Residential Use Alternative

The Residential Use Alternative would result in greater traffic impacts and incrementally greater impacts on air quality as compared to the proposed project, as it would develop 43 more residential lots than the proposed project**.** However, this alternative fails to achieve several of the project objectives, including developing an equestrian-oriented project that incorporates both public and private equestrian facilities and supporting the proposed public amenities (fire station site), or achieving consistency with the rural community character of Jamul. For these reasons, this alternative is rejected.

5.6 Analysis of the No Groundwater Alternative (Alternative 5)

5.6.1 No Groundwater Alternative Description and Setting

The No Groundwater Alternative would develop the project site as proposed by the current project, with 46 new residential lots and all accompanying uses, such as the public and private equestrian facilities. A lot would be reserved onsite for future relocation of the fire station. Similar to the proposed project, the eastern portion of the property would require annexation into the SDCWA and MWD for water service; however, this alternative does not propose the use of groundwater for irrigation of the polo field.

5.6.2 Comparison of the Effects of the No Groundwater Alternative to the Proposed Project

Traffic and Circulation

Under this alternative, traffic impacts would be similar as those of the proposed project. The number of residential units would be the same, and no additional uses are proposed with the No Groundwater Alternative. Therefore, mitigation to partially reduce potential traffic impacts would be the same as for the proposed project.

Biological Resources

With this alternative, the project design and uses would be the same as the proposed project. Mitigation measures for the No Groundwater Alternative would be the same as those for the proposed project. Impacts to groundwater dependent vegetation would be reduced because the alternative would not utilize groundwater resources for irrigation or other purposes. Therefore, potential impacts on biological resources from the No Groundwater Alternative would be reduced as compared to the proposed project.

Hazards

With the No Groundwater Alternative, potential impacts resulting from exposure to hazards or hazardous materials would be similar to the proposed project, and mitigation measures would also be similar.

Noise

With this alternative, potential noise impacts would be similar to the proposed project, as no changes to the development footprint would occur. Mitigation measures for the No Groundwater Alternative would be similar to the proposed project.

Cultural Resources

With this alternative, potential impacts on cultural resources would be similar to the proposed project, as the project design would be the same. Mitigation measures for the No Groundwater Alternative would be similar to the proposed project.

Land Use

With the No Groundwater Alternative, the project design and proposed uses would be the same as those of the proposed project. As with the proposed project, land use impacts would be less than significant under this alternative. Therefore, impacts to land use would be similar to the proposed project.

Agricultural

With this alternative, project design and proposed uses would be the same. As with the proposed project, impacts on agricultural resources would be less than significant under this alternative. Therefore, impacts to agricultural resources would be similar to the proposed project.

Groundwater Resources

No significant impacts on groundwater resources were identified with the proposed project. With this alternative, the eastern portion of the property would be annexed into to the SDCWA and MWD for water service, similar to the proposed project, to support the residential uses. However, this alternative would not utilize groundwater for irrigation of the turf areas associated with the polo field and associated equestrian uses on Lot 51, and would instead rely on the public water supply. As a result, this alternative would have reduced demand on the area groundwater supply by up to 22.2 acre-feet per year. Therefore, impacts on groundwater resources with this alternative would be reduced as compared to those of the proposed project.

Hydrology and Water Quality

With this alternative, no changes to the project design or proposed uses would occur. As provided in the Preliminary Drainage Study prepared for the PVR project, the proposed project will not significantly alter onsite drainage patterns. BMPs would be incorporated into the project design to prevent potential pollutants from entering these drainages. A SWPPP would be required and implemented during and at the completion of construction to prevent

runoff pollution. Therefore, impacts on hydrology and water quality under this alternative would be similar to those of the proposed project.

Air Quality

With the No Groundwater Alternative, the proposed project design and proposed uses would be the same. As with the proposed project, air quality impacts would be less than significant, and would be similar to those of the proposed project.

Utilities and Services

With this alternative, a greater amount of imported water would be required from OWD for irrigation purposes. Therefore, under this alternative, impacts on utilities and services would be greater as compared to the proposed project, and may be potentially significant.

5.6.3 Rationale for Preference of the Proposed Project over the No Groundwater Use Alternative

Overall, impacts would be the same or reduced for this alternative as compared to the proposed project. Mitigation for the proposed project is provided to limit the use of groundwater to an annual amount not to exceed the annual amount of groundwater recharge generated by the project. By utilizing groundwater for the proposed project, the project would be consistent with established SDCWA *Water Use Efficiency Guidelines* that apply to the project to reduce demand for imported water service. However, with this alternative, the reliance on imported water would be greater, thereby creating an inconsistency with the established SDCWA guidelines. Refer to Appendix F-1 of this EIR for a discussion of project conformance with the SDCWA efficiency guidelines.

As this alternative is the same as the proposed project, with the exception of groundwater use, it accomplishes the majority of the project objectives. Therefore, this alternative is not rejected.

Table 5-1
Comparison of Project Alternative Impacts on Significant Proposed Project Impacts

Impact Category	No Development Alternative	No Project Alternative	Existing Land Use Alternative	Residential Use Alternative	No Groundwater Alternative
Traffic and Circulation	Lesser	Lesser	Lesser	Greater	Similar
Biological Resources	Lesser	Similar	Lesser	Similar	Lesser
Hazards	Lesser	Lesser	Lesser	Greater	Similar
Noise	Lesser	Lesser	Greater	Greater	Similar
Cultural Resources	Lesser	Similar	Similar	Similar	Similar
Land Use	Lesser	Lesser	Lesser	Similar	Similar
Agricultural Resources	Lesser	Lesser	Similar	Similar	Similar
Groundwater Resources	Greater	Greater	Lesser	Lesser	Lesser
Hydrology and Water Quality	Greater	Similar	Similar	Greater	Similar
Air Quality	Lesser	Lesser	Lesser	Greater	Similar
Utilities and Service Systems	Lesser	Lesser	Lesser	Greater	Greater

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